

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-~~CF~~-SEITZ

UNITED STATES OF AMERICA.

Plaintiff,

-VS-

JULIUS BRUCE CHIUSANO.

**Defendant.**

## MOTION FOR PERMISSION TO TRAVEL

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests this Honorable Court enter an Order permitting the Defendant to leave the State of Florida, and travel to San Juan, Purto Rico, and for grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, is presently released on a fifty thousand dollar corporate surety and a fifty thousand dollar personal surety bond with supervised release.
2. That the Defendant is also released on bond on a one hundred thousand dollar corporate surety bond in Case No. 00-6273-Cr-Huck.
3. That the Defendant has been on supervised release since October 5, 2000.
4. That as of July 30, 2001 the Defendant has entered a plea of guilty to Count 6 of the instant Indictment.
5. That the Defendant respectfully requests this Honorable Court permit the Defendant to travel to San Juan, Puerto Rico for a weekend holiday.
6. That the Defendant desires to travel outside of the State of Florida for approximately Four (4) days beginning on or about August 17, 2001 and returning August 20, 2001.
7. That a copy of the Defendant's Itinerary is attached hereto as Defendant's Exhibit One (1).

8. That undersigned has spoken to the Pretrial Services officer, Raul Sagaro, regarding this travel permit and he has no objection.

9. That prior to the Defendant's departure the Defendant will provide addresses and telephone numbers where he will be staying to Raul Sagaro of the Pretrial Services Office in Dade County, Florida, as required under Defendant's terms and conditions of supervised release and report immediately upon his return to the jurisdiction.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order granting the Defendant's request permitting the Defendant to travel outside the State of Florida to San Juan, Puerto Rico.

10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and he states that he opposes the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and Raul Sagaro, Pretrial Services, 330 Biscayne Blvd., Suite 500, Miami, FL 33132, by U.S. Mail, and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 7<sup>th</sup> AUGUST, 2001.

Respectfully submitted,

DONALD R. SPADARO, P.A.  
Attorneys for DEFENDANT/CHIUSANO  
1000 South Federal Highway  
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By: 

DONALD R. SPADARO, ESQUIRE  
Florida Bar No.: 320341

Bance CHUSANO

Aug 17. A A-<sup>FLIGHT</sup>1305-10:55 Departure  
1:30pm <sup>miami</sup> arriving

Return - 2 Day F1 ~~FLIGHT~~ Arrive 3:19pm  
ARRIVING 6:55P.

Hotel Ritz Carlton San Juan P.R.